

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ERNIE HINES D/B/A COLORFUL MUSIC	)	
Plaintiff	)	Action No.
v.	)	19-CV-04587
	)	
ROC-A-FELLA RECORDS INC, DEF JAM	)	
RECORDINGS INC., UNIVERSAL MUSIC GROUP,	)	SECOND
SONY MUSIC ENTERTAINMENT,	)	AMENDED
SHAWN CARTER p/k/a JAY-Z and	)	COMPLAINT
TIMOTHY MOSLEY p/k/a TIMBALAND	)	
Defendants	)	
	)	

**JURISDICTION**

1. Jurisdiction is based on diversity of citizenship and federal question. The amount in controversy exceeds Two Million Dollars (\$2,000,000.00).

**PARTIES**

2. Ernie Hines d/b/a Colorful Music (“Hines”) has an address of 227 Elgin Ave. Apt 2A Forest Park, IL 60130.
3. Roc-a-Fella Records Inc. (“RFR”), is a New York entity, DOS ID 1988516.
4. Def Jam Recordings Inc. (“Def Jam”) is a New York entity with an address of 1755 Broadway 7<sup>th</sup> Floor, New York, NY 10019.

5. Universal Music Group Inc. (“Universal”) is a Delaware entity and is registered in New York, DOS ID 3178160. Universal owns Def Jam and RFR, and has a business address of 2220 Colorado Ave., Santa Monica, CA 90404. The registered agent for Universal is CT Corporation System, 28 Liberty Street, New York, NY 10005.
6. Sony Music Entertainment (“Sony”), operated in New York and Sony has an office at 25 Madison Ave, New York, NY 10010.
7. Shawn Carter p/k/a (“Carter” or “Jay-Z”) is an American mogul and rapper, and a resident of the State of New York.
8. Timothy Mosley p/k/a (“Mosley” or “Timbaland”) is an American music producer. He is the owner of Timbaland Productions Inc., a Virginia entity, ID No. 05264957, with a business address of L.L. Business Management Inc., 3000 Marcus Ave. Suite 1W5, Lake Success, NY 11042 on file with the Virginia Secretary of State’s Office. The registered agent for Timbaland Productions, Inc. is United Corporate Services, Inc. 7705 Yolanda Road, Richmond, VA 23229.

## **FACTS**

9. Hines is the co-author and composer of the song “Help Me Put Out The Flame (In My Heart)” (“Help Me”) which Hines registered with the United States Copyright Office. It was originally registered in 1969 and has a renewal registration of EU0000154302 and a renewal and addendum registration of RE0000932464. The song was released on Stax Records over forty (40) years ago.

10. “Help Me” was also released in 1993 on The Complete Stax Volt Soul Singles. See <https://www.allmusic.com/album/the-complete-stax-volt-soul-singles-vol-2-1968-1971-mw0000622330>. The 1993 version of “Help Me” has a United States Copyright Registration of PA 2-184-476.

**Help Me**

11. The musical composition for “Help Me” and the copyrights relating to “Help Me”, contain a guitar riff at the beginning of the song. The guitar riff is original and contains protectable elements which have been copyrighted by Hines.

12. Defendants Carter and Mosley used the musical composition “Help Me” and placed the protectable guitar riff into the musical composition for “Paper Chase” that Carter and Mosley contend they authored. The songs “Help Me” and “Paper Chase” are substantially similar as Carter and Mosley used the protectable guitar riff of the musical composition of “Help Me” to create the musical composition of “Paper Chase”. The Defendants acknowledge the use of “Help Me” in the composition “Paper Chase” See Exhibit B.

13. Defendant Mosely used the musical composition “Help Me” and placed the protectable guitar riff into the musical composition for “Toe 2 Toe” which Mosley contends he authored. The songs “Toe 2 Toe” and “Help Me” are substantially similar as Mosley included the protectable guitar riff in the song “Help Me” in the composition for “Toe 2 Toe”.

14. Carter and Mosely used the protectable elements of “Help Me” in violation of Plaintiff’s rights under the Copyright Act and have placed the guitar riff from “Help Me” into the compositions of “Paper Chase” and “Toe 2 Toe”.

**Vol. 2... *Hard Knock Life* 1998- Jay-Z**

15. ***Vol. 2... Hard Knock Life*** (“HKL”) is the third studio album by American rapper Jay-Z. It was released on September 29, 1998, by RFR and Def Jam. It went on to become a commercially successful album, selling over 5 million copies in the United States. See Exhibit A.

16. The album HKL contains the song “Paper Chase” which is performed by Jay-Z featuring the legendary female rapper “Foxy Brown” and is produced by Timbaland. The credits on the song identify the composers/writers of the song as Jay-Z and Timbaland.

17. All the Defendants were aware that the song “Paper Chase” contained the guitar riff from the composition of “Help Me” as performed by Hines. Due to the use of the protectable guitar riff, “Help Me” and “Paper Chase” are substantially similar. Jay-Z and Timbaland contend they are the authors and owners of the song “Paper Chase”.

18. Jay-Z and Timbaland failed to financially acknowledge Hines’ contributions to the composition “Paper Chase”. Upon information and belief, Jay-Z and Timbaland

provided the song “Paper Chase” (which infringes on the protectable guitar riff of Help Me) to RFR, Def Jam, Universal and Sony for the corporate defendants to sell and market.

19. All the Defendants knew or should have known that “Paper Chase” contained the protectable guitar riff of the composition “Help Me” yet none of the defendants from 1998 through 2019 ever attempted to contact Hines or pay for the use of the composition or obtain a license from Hines. The guitar riff of “Help Me” contains protectable elements that have been placed in “Paper Chase”.

20. Hines is a senior citizen, does not listen to rap music and was unaware that “Paper Chase” contained his music and composition until 2018.

21. The credits for “Paper Chase” on Tidal, another entity owned by Jay-Z, clearly identifies the unauthorized use of the composition of “Help Me”, indicating that all of the defendants knew of the use of Hines’ song in “Paper Chase”. See Exhibit B.

22. Upon information and belief, “Paper Chase” has been played millions of times on traditional, satellite and digital radio and appears on multiple compilation albums including the 2003 release, “Bring It On- The Best of Jay-Z”.

<https://www.discogs.com/Jay-Z-Bring-It-On-The-Best-Of/release/1031110> and the 2011

release “The Best Of Jay-Z” <https://www.discogs.com/Jay-Z-The-Best-Of/release/6244319>, released by Sony.

23. Despite the commercial success of HKL and “Paper Chase”, the Defendants have failed to pay Plaintiff and never informed Plaintiff of the use of his composition. The Defendants knew or should have known of their copyright infringement and their actions were willful in the infringement. All the Defendants knew that they did not have a clearance from Hines to use the “Help Me” composition in “Paper Chase”. The Defendants converted the use of “Help Me” for their own benefit.

**100 %Ginuwine 1999-Ginuwine**

24. Upon information and belief, the same protectable elements of the music composition of “Help Me” was included by Sony and Timbaland in the song “Toe 2 Toe” which was released on the Ginuwine album “100% Ginuwine” in March 1999 by Sony. “100% Ginuwine” has sold over 2 Million copies to date. Exhibit C.

25. Timbaland is identified as one of the composers of the song “Toe 2 Toe” on the Ginuwine song released by Sony in 1999. “Toe 2 Toe” contains the protectable guitar riff of “Help Me”. “Help Me” and “Toe 2 Toe” are substantially similar due to the use of the guitar riff. Timbaland provided the song “Toe 2 Toe” (which infringes on the protectable guitar riff in “Help Me”) to Sony.

26. Neither Timbaland or Sony ever attempted to contact Hines to get his clearance for the use of the protectable guitar riff from the composition “Help Me” on the Ginuwine album in the song “Toe 2 Toe”.

27. The Defendants have unlawfully infringed on Hines’ copyright and have converted the copyright for their own use. The infringement by the Defendants is knowing, willful and continuous.

28. The Defendants never had Plaintiff’s consent nor did the Defendants ever seek Plaintiff’s consent for over twenty (20) years. Plaintiff learned of the use of his song “Help Me” in “Paper Chase” & “Toe 2 Toe” on the Jay-Z and Ginuwine albums in 2018.

**COUNT I**  
**COPYRIGHT INFRINGEMENT**  
**17 U.S.C. § 501, 502, 504 and 505**  
**AGAINST ROC-A-FELLA RECORDS INC.**

29. Hines repeats and realleges each of the preceding paragraphs 1-28 above.

30. Hines is the co-author of “Help Me” which is registered in the United States Copyright Office.

31. RFR has unlawfully used the protectable elements of the musical composition of “Help Me” and never sought Hines’ approval to use the musical composition.

32. RFR has infringed on Hines's exclusive rights under the United States Copyright Act. "Help Me" is substantially similar to "Paper Chase".

33. RFR sold, marketed and distributed the song "Paper Chase" in violation of the Plaintiff's rights. "Paper Chase" infringes on the musical composition of "Help Me" in violation of Plaintiff's rights.

34. Upon information and belief, Defendant RFR licensed "Paper Chase" to Sony in violation of Plaintiff's rights.

35. Upon information and belief, RFR has paid or has caused the other corporate defendants to pay Carter and Mosely monies associated with the composition "Paper Chase".

36. RFR have violated Plaintiff's rights to control, sell, market, and distributed derivate works of "Help Me" and have committed copyright infringement. "Paper Chase" infringes on the musical composition of "Help Me" in violation of Plaintiff's rights.

37. Hines seeks to (1) enjoin the activity of RFR (2) actual or statutory damages per sale (3) Attorneys fees relating to Defendants' actions and (4) an injunction prohibiting the sale of the composition.



**COUNT II**  
**COPYRIGHT INFRINGEMENT**  
**17 U.S.C. § 501, 502, 504 and 505**  
**AGAINST DEF JAM RECORDINGS, INC.**

38. Hines repeats and realleges each of the preceding paragraphs 1-28 above.
39. Hines is the co-author of “Help Me” which is registered in the United States Copyright Office.
40. Def Jam has unlawfully used the protectable elements of the musical composition of “Help Me” and never sought Hines’ approval to use the musical composition.
41. Def Jam has infringed on Hines’s exclusive rights under the United States Copyright Act. “Help Me” is substantially similar to “Paper Chase”.
42. Def Jam sold, marketed and distributed the song “Paper Chase” in violation of the Plaintiff’s rights. “Paper Chase” infringes on the musical composition of “Help Me” in violation of Plaintiff’s rights.
43. Upon information and belief, Defendant Def Jam licensed “Paper Chase” to Sony in violation of Plaintiff’s rights.
44. Upon information and belief, Def Jam has paid or has caused the other corporate defendants to pay Carter and Mosely monies associated with the composition “Paper Chase”.

45. Def Jam have violated Plaintiff's rights to control, sell, market, and distributed derivate works of "Help Me" and have committed copyright infringement.

46. Hines seeks to (1) enjoin the activity of Def Jam (2) actual or statutory damages per sale (3) Attorneys fees relating to Defendants' actions and (4) an injunction prohibiting the sale of the composition.

**COUNT III**  
**COPYRIGHT INFRINGEMENT**  
**17 U.S.C. § 501, 502, 504 and 505**  
**AGAINST UNIVERSAL MUSIC GROUP**

47. Hines repeats and realleges each of the preceding paragraphs 1-28 above.

48. Hines is the co-author of "Help Me" which is registered in the United States Copyright Office.

49. Universal has unlawfully used the protectable elements of the musical composition of "Help Me" and never sought Hines' approval to use the musical composition.

50. Universal has infringed on Hines's exclusive rights under the United States Copyright Act. "Help Me" is substantially similar to "Paper Chase".

51. Universal sold, marketed and distributed the song “Paper Chase” in violation of the Plaintiff’s rights. “Paper Chase” infringes on the musical composition of “Help Me” in violation of Plaintiff’s rights.

52. Upon information and belief, Defendant Universal licensed “Paper Chase” to Sony in violation of Plaintiff’s rights.

53. Upon information and belief, Universal has paid or has caused the other corporate defendants to pay Carter and Mosely monies associated with the composition “Paper Chase”.

54. Universal has violated Plaintiff’s rights to control, sell, market, and distributed derivate works of “Help Me” and have committed copyright infringement.

55. Hines seeks to (1) enjoin the activity of Universal (2) actual or statutory damages per sale (3) Attorneys fees relating to Defendants’ actions and (4) an injunction prohibiting the sale of the composition.

**COUNT IV**  
**COPYRIGHT INFRINGEMENT**  
**17 U.S.C. § 501, 502, 504 and 505**  
**AGAINST SONY MUSIC ENTERTAINMENT FOR**  
**THE COMPOSITION PAPER CHASE**

56. Hines repeats and realleges each of the preceding paragraphs 1-28 above.

57. Hines is the co-author of “Help Me” which is registered in the United States Copyright Office.

58. Sony has unlawfully used the protectable elements of the musical composition of “Help Me” and never sought Hines’ approval to use the musical composition.

59. Sony has infringed on Hines’s exclusive rights under the United States Copyright Act. “Help Me” is substantially similar to “Paper Chase”.

60. Sony sold, marketed and distributed the song “Paper Chase” in violation of the Plaintiff’s rights. “Paper Chase” infringes on the musical composition of “Help Me” in violation of Plaintiff’s rights.

61. Upon information and belief, Defendants Universal, RFR and/or Def Jam licensed “Paper Chase” to Sony in violation of Plaintiff’s rights.

62. Upon information and belief, Sony has paid or has caused the other corporate defendants to pay Carter and Mosely monies associated with the composition “Paper Chase”.

63. Sony has violated Plaintiff’s rights to control, sell, market, and distributed derivate works of “Help Me” and have committed copyright infringement.

64. Hines seeks to (1) enjoin the activity of Sony (2) actual or statutory damages per sale (3) Attorneys fees relating to Defendants' actions and (4) an injunction prohibiting the sale of the composition.

**COUNT V**  
**COPYRIGHT INFRINGEMENT**  
**17 U.S.C. § 501, 502, 504 and 505**  
**AGAINST SONY MUSIC ENTERTAINMENT FOR**  
**THE COMPOSITION TOE 2 TOE**

65. Hines repeats and realleges each of the preceding paragraphs 1-28 above.

66. Hines is the co-author of "Help Me" which is registered in the United States Copyright Office.

67. Sony has unlawfully used the protectable elements of the musical composition of "Help Me" and never sought Hines' approval to use the musical composition.

68. Sony has infringed on Hines's exclusive rights under the United States Copyright Act. "Help Me" is substantially similar to "Toe 2 Toe".

69. Sony sold, marketed and distributed the song "Toe 2 Toe" in violation of the Plaintiff's rights. "Toe 2 Toe" infringes on the musical composition of "Help Me" in violation of Plaintiff's rights.

70. Sony has paid Mosely monies associated with the composition "Toe 2 Toe".

71. Sony has violated Plaintiff's rights to control, sell, market, and distributed derivative works of "Toe 2 Toe" and have committed copyright infringement.

72. Hines seeks to (1) enjoin the activity of Sony (2) actual or statutory damages per sale (3) Attorneys fees relating to Defendants' actions and (4) an injunction prohibiting the sale of the composition.

**COUNT VI**  
**COPYRIGHT INFRINGEMENT**  
**17 U.S.C. § 501, 502, 504 and 505**  
**AGAINST SHAWN CARTER P/K/A JAY-Z FOR**  
**THE COMPOSITION PAPER CHASE**

73. Hines repeats and realleges each of the preceding paragraphs 1-28 above.

74. Hines is the co-author of "Help Me" which is registered in the United States Copyright Office.

75. Jay-Z is a composer of the song "Paper Chase". Jay-Z unlawfully used the protectable elements of the musical composition of "Help Me" in the song "Paper Chase" and never sought Hines' approval to use the musical composition.

76. "Help Me" is substantially similar to "Paper Chase". "Paper Chase" infringes on the musical composition of "Help Me" in violation of Plaintiff's rights.

77. Defendant Jay-Z claims ownership of the composition for “Paper Chase” which contains the protectable elements of the composition “Help Me”. Carter provided the infringing song to defendants Universal, RFR, Def Jam and Sony.

78. Jay Z has collected music publishing royalties from various entities in violation of Hines’ rights.

79. Jay-Z has harmed Plaintiff in his business.

.

**COUNT VII**  
**COPYRIGHT INFRINGEMENT**  
**17 U.S.C. § 501, 502, 504 and 505**  
**AGAINST TIMOTHY MOSLEY P/K/A TIMBALAND FOR THE**  
**COMPOSITION PAPER CHASE**

80. Hines repeats and realleges each of the preceding paragraphs 1-28 above.

81. Hines is the co-author of “Help Me” which is registered in the United States Copyright Office.

82. Timbaland is a composer of the song “Paper Chase”. Timbaland unlawfully used the protectable elements of the musical composition of “Help Me” in the song “Paper Chase” and never sought Hines’ approval to use the musical composition.

83. “Help Me” is substantially similar to “Paper Chase”. “Paper Chase” infringes on the musical composition of “Help Me” in violation of Plaintiff’s rights.

84. Timbaland claims ownership of the composition for “Paper Chase” which contains the protectable elements of the composition “Help Me”. Timbaland provided the infringing song to defendants Universal, RFR, Def Jam and Sony.

85. Timbaland has collected music publishing royalties from various entities in violation of Hines’ rights.

86. Timbaland has harmed Plaintiff in his business.

**COUNT VIII**  
**COPYRIGHT INFRINGEMENT**  
**17 U.S.C. § 501, 502, 504 and 505**  
**AGAINST TIMOTHY MOSLEY P/K/A TIMBALAND FOR THE**  
**COMPOSITION TOE 2 TOE**

87. Hines repeats and realleges each of the preceding paragraphs 1-28 above.

88. Hines is the co-author of “Help Me” which is registered in the United States Copyright Office.

89. Timbaland is a composer of the song “Toe 2 Toe”. Timbaland unlawfully used the protectable elements of the musical composition of “Help Me” in the song “Toe 2 Toe” and never sought Hines’ approval to use the musical composition.

90. “Help Me” is substantially similar to “Toe 2 Toe”. “Toe 2 Toe” infringes on the musical composition of “Help Me” in violation of Plaintiff’s rights.



91. Timbaland claims ownership of the composition for “Toe 2 Toe” which contains the protectable elements of the composition “Help Me”. Timbaland provided the infringing song to defendant Sony.

92. Timbaland has collected music publishing royalties from various entities in violation of Hines’ rights.

93. Timbaland has harmed Plaintiff in his business.

**COUNT IX**  
**DECLARATORY JUDGEMENT UNDER 28 U.S.C. § 2201**  
**AGAINST DEFENDANTS CARTER AND MOSLEY**

94. Hines repeats and realleges each of the preceding paragraphs 1-28 above.

95. Defendants utilized Hines’ composition in “Paper Chase” and “Toe 2 Toe” without his consent.

96. Hines must be identified as an owner of the compositions “Paper Chase” and “Toe 2 Toe”.

97. A controversy exists as the Defendants Carter and Mosley contend to be the only owners of the song “Paper Chase” and Mosely contends to be an owner of “Toe 2 Toe” and the sole creator to the musical composition (not the lyrics).

98. Upon information and belief, Elgin Lumpkin p/k/a “Ginuwine” makes no claim to the music associated with the song “Toe 2 Toe” only lyrics.

99. “Paper Chase” & “Toe 2 Toe” each contains protectable elements of the musical composition “Help Me”.

100. “Help Me” is substantially similar to “Paper Chase”.

101. “Help Me” is substantially similar to “Toe 2 Toe”.

102. Hines seeks judgment indicating that he has an interest in “Paper Chase” and “Toe 2 Toe”.

WHEREFORE, The Plaintiff demands a jury trial and the following:

1. Judgment on all counts and amount to be determined by the Court;
2. Interest;
3. Attorneys Fees;
4. A permanent injunction, and,
5. Any other relief this Court deems just and equitable.

ERNIE HINES D/B/A COLORFUL MUSIC  
By His Attorneys,



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CB3465  
Brown & Rosen LLC  
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Dated: October 18, 2019

# EXHIBIT A

HOME TITLE SUMMARY CHARTS MARKETING PICKUP SETS ARCHIVES ACCOUNT HELP

## Title Report: National Sales

ADD TO SET

New Set

LOAD TO EXCEL

Title: VOL. 2-HARD KNOCK LIFE

Artist: JAY Z

Format: Album

Label: R0CN

Release Date: 09/22/98

Catalog: CAT:58357

2019 YTD: 1,421

2019 YTD Digital: 576

Tracks TW 749  
RTD 2,365,593  
YTD 10,927

Weeks Period Rank  
Top 200 TW  
LW  
2W

## Release To Date Sales

	Units	% TOT
Total:	5,445,437	
LP:	25,372	0
Cassette:	843,406	15
CD:	4,480,227	82
DVD:	0	0
Digital:	96,433	2

## BUSINESS

Album(000)	This Week
Total:	2
Chain:	
Independent:	
Mass Merch:	
Non Traditional:	
Digital:	

Week Ending: 04/11/2019

Strata: All

Config: All

Weeks: 4

Display: % CHG

Strata: All Config: All	WK End 04/11/19	% CHG	RK	WK End 04/04/19	% CHG	RK	WK End 03/28/19	% CHG	RK	WK End 03/21/19	% CHG	RK
<b>Total</b>	93	7		87	-32		128	-4		133	-16	
<b>Store Strata</b>												
Chain	10	-23		13	-58		31	-14		36	3	
Independent	37	54		24	-40		40	25		32	-49	
Mass Merch	0			0			0			0		
Digital	38	-10		42	-2		43	-20		54	12	
Non Traditional	8	0		8	-43		14	27		11	-15	
Internet/Mail Order/Venue	8	0		8	-43		14	27		11	-15	
Non Traditional Retail Outlets	0			0			0			0		
<b>Geographic Region</b>												
Northeast	4	100		2	-90		21	200		7	-12	
Middle Atlantic	9	-53		19	-30		27	35		20	-49	
East North Central	9	12		8	-58		19	6		18	-25	
West North Central	2	0		2	-33		3	50		2	100	
South Atlantic	52	100		26	-13		30	-30		43	-34	
South Central	7	0		7	40		5	-72		18	80	
Mountain	5	150		2	-67		6	100		3	200	
Pacific	5	-76		21	24		17	-23		22	100	
<b>Geographic Place</b>												
City	31	-31		45	12		40	-7		43	-27	
Suburb	19	-10		21	-66		62	32		47	24	
Rural	43	105		21	-19		26	-40		43	-31	

# EXHIBIT B

< > SAMPLING: VOL. 2... HARD KNOCK LIFE

L H  
TIDAL HiFi

What's New

TIDAL Rising

Playlists

Genres

Music Videos

Movies & Shows

My Music

+ Create New Playlist

# Sampling: Vol. 2... Hard Kn

Created by: TIDAL Tracks: 19 Time: 1:20:04

'Vol. 2... Hard Knock Life' is without question one of the most important albums in JAY-Z's discography. It's filled with hit records that still resonate with fans today and also defines a pivotal moment in his career when he first became a multi-platinum rap superstar. Celebrate the 19th birthday of Hov's classic (September 29) with these album highlights paired with the songs they sampled, including the historic use of the 'Annie' movie's "It's A Hard-Knock Life" theme song for the title track.

Play
 Favorite
 Share

#	TITLE	ARTIST	ALBUM
1	Intro - Hand It Down	JAY-Z, Memphis Bleek	Vol. 2... Hard Knock Life
	Are You Man Enough? (Single Version)	<u>Four Tops</u>	Shaft In Africa (Soundtrack)

LH  
TIDAL HiFi

What's New

TIDAL Rising

Playlists

Genres

Music Videos

Movies & Shows

My Music

Create New Playlist

< > SAMPLING: VOL. 2... HARD KNOCK LIFE

Sampling: Vol. 2... Hard Kn

Created by: TIDAL Tracks: 19 Time: 1:20:04

'Vol. 2... Hard Knock Life' is without question one of the most important al in JAY-Z's discography. It's filled with hit records that still resonate with fan today and also defines a pivotal moment in his career when he first becam multi-platinum rap superstar. Celebrate the 19th birthday of Hov's classic (September 29) with these album highlights paired with the songs they sampled, including the historic use of the 'Annie' movie's "It's A Hard-Kno Life" theme song for the title track.

Play

★ Favorite

Share

...

#	TITLE	ARTIST	ALBUM
1	Intro - Hand It Down	JAY-Z, Memphis Bleek	Vol. 2... Hard Knock Life
	Are You Man Enough? (Single Version)	Four Tops	Shaft In Africa (Soundtrack)
3	Hard Knock Life (Ghetto Anthem)	JAY-Z	Vol. 2... Hard Knock Life
4	Annie: It's the Hard-Knock Life	Andrea McArdle, Annie Ense...	Annie (Original Broadway Ca...
5	Nigga What, Nigga Who (Originator 99)	JAY-Z, Big Jaz	Vol. 2... Hard Knock Life
6	Sunshine	Earth, Wind & Fire	Gratitude
7	Cheers 2 U	Playa	Cheers 2 U
8	A Week Ago	JAY-Z, Too \$hort	Vol. 2... Hard Knock Life
9	Ballad for the Fallen Soldier	The Isley Brothers	Between the Sheets
10	Paper Chase	JAY-Z, Foxy Brown	Vol. 2... Hard Knock Life
11	Help Me Put Out The Flame (In My Heart)	Ernie Hines	The Complete Stax / Volt So...
12	Reservoir Dogs	JAY-Z, The Lox, Sauce Mon...	Vol. 2... Hard Knock Life
	Theme From Shaft (Album - Remastered)	Isaac Hayes	Shaft (Deluxe Edition)
14	It's Like That	JAY-Z, Kid Capri	Vol. 2... Hard Knock Life
15	Beggar Song	Wet Willie	Wet Willie
16	It's Alright	Memphis Bleek, JAY-Z	Vol. 2... Hard Knock Life

LH  
TIDAL HiFi

What's New

TIDAL Rising

Playlists

Genres

Music Videos

Movies & Shows

My Music

Create New Playlist

< > SAMPLING: VOL. 2... HARD KNOCK LIFE

3 Hard Knock Life (Ghetto Anthem)

JAY-Z

Vol. 2... Hard Knock Life

4 Annie: It's the Hard-Knock Life

Andrea McArdle, Annie Ense...

Annie (Original Broadway Ca...

5 Nigga What, Nigga Who (Originator 99)

JAY-Z, Big Jaz

Vol. 2... Hard Knock Life

6 Sunshine

Earth, Wind & Fire

Gratitude

7 Cheers 2 U

Playa

Cheers 2 U

8 A Week Ago

JAY-Z, Too \$hort

Vol. 2... Hard Knock Life

9 Ballad for the Fallen Soldier

The Isley Brothers

Between the Sheets

10 Paper Chase

JAY-Z, Foxy Brown

Vol. 2... Hard Knock Life

11 Help Me Put Out The Flame (In My Heart)

Ernie Hines

The Complete Stax / Volt So...

12 Reservoir Dogs

JAY-Z, The Lox, Sauce Mon...

Vol. 2... Hard Knock Life

Theme From Shaft (Album - Remastered)

Isaac Hayes

Shaft (Deluxe Edition)

14 It's Like That

JAY-Z, Kid Capri

Vol. 2... Hard Knock Life

15 Beggar Song

Wet Willie

Wet Willie

16 It's Alright

Memphis Bleek, JAY-Z

Vol. 2... Hard Knock Life

# EXHIBIT C





HOME TITLE SUMMARY CHARTS MARKETING PICKUP SETS ARCHIVES ACCOUNT HELP

Title Report: National Sales

ADD TO SET

New Set

LOAD TO EXCEL

Title: <b>100% GINUWINE</b>			
Artist: <b>GINUWINE</b>			
Format: <b>Album</b>			
Label: <b>COL</b>			
Release Date: <b>03/16/99</b>			
Catalog: <b>CAT:69598</b>			
2019 YTD:	328		
2019 YTD Digital:	177		
Tracks	TW	268	
	RTD	510,074	
	YTD	4,111	
Weeks	Period	Rank	
Top 200	TW		
	LW		
	2W		

Release To Date Sales		
	Units	% TOT
Total:	2,013,498	
LP:	1,732	0
Cassette:	344,424	17
CD:	1,654,064	82
DVD:	0	0
Digital:	13,278	1

BUSINESS	
Album(000)	This Week
Total:	2,013
Chain:	1,732
Independent:	344
Mass Merch:	1,654
Non Traditional:	0
Digital:	13

Week Ending: 04/11/2019

Strata: All

Config: All

Weeks: 4

Display: % CHG

Strata: All Config: All	WK End 04/11/19	% CHG	RK	WK End 04/04/19	% CHG	RK	WK End 03/28/19	% CHG	RK	WK End 03/21/19	% CHG	RK
<b>Total</b>	10	-63		27	0		27	-13		31	0	
<b>Store Strata</b>												
Chain	1	0		1	0		1	0		1	-67	
Independent	0			0	-100		14	0		14	0	
Mass Merch	0			0			0			0		
Digital	8	-67		24	140		10	-38		16	33	
Non Traditional	1	-50		2	0		2			0	-100	
Internet/Mail Order/Venue	1	-50		2	0		2			0	-100	
Non Traditional Retail Outlets	0			0			0			0		
<b>Geographic Region</b>												
Northeast	0			0			0	-100		1		
Middle Atlantic	4	100		2			0			0	-100	
East North Central	1	-80		5	150		2	100		1	-50	
West North Central	0	-100		2	100		1	-50		2	100	
South Atlantic	4	-43		7	-67		21	162		8	-47	
South Central	1	-67		3	50		2	100		1	-75	
Mountain	0	-100		4	300		1	-50		2	0	
Pacific	0	-100		4			0	-100		16	167	
<b>Geographic Place</b>												
City	3	-70		10	-44		18	350		4	-82	
Suburb	4	-50		8	167		3	-50		6	0	
Rural	3	-67		9	50		6	-71		21	600	